



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: OCT 24 2017

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Schnitzer, Concord, NH

FROM: Natalie Topinka, Environmental Scientist
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Schnitzer

Facility Location: 25 Sandquist St, Concord, NH

Date of Inspection: July 28, 2017

EPA Inspector(s):

1. Natalie Topinka, Environmental Scientist
2. Abdi Mohamoud, Environmental Engineer

Other Attendees

1. Mark Ledgard, NH Dept of Environmental Services
2. Ken Blay, Facilities Manager, Schnitzer
3. Tom Dimaggio, Scale Operator, Schnitzer
4. Craig Bragg, Schnitzer

Purpose of Inspection: Assess compliance with the safe disposal regulations pertaining to refrigerant-containing appliances and motor vehicle air conditioners.

Facility Type: scrap metal recycler

Regulations Central to Inspection: 40 CFR Part 82 Subpart F

Arrival Time: 8:05 am

Departure Time: 8:50 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Schnitzer representatives present unless otherwise noted.

Process Description:

Schnitzer's Sandquist St. facility accepts a variety of metal items from members of the public and local businesses to be sorted for recycling. The facility has a baler on-site and a shearer.

Staff Interview: The facility accepts vehicles and small appliances, such as refrigerators and window air conditioners, for recycling. Many of the vehicles come from local dealerships or towing companies. Schnitzer does not recover refrigerant from appliances or vehicles; those items are rejected if they contain refrigerant. Schnitzer representatives estimated that the facility receives 25-30 cars per week and more than one appliance per day. The customer must get the pile inspector's signature in order to get paid for their load. If an item is rejected because it is full of refrigerant, the customer may bring the same item back to Schnitzer after 24 hours if it is "cleaned out." Customers complete a Hazardous Materials Removal Compliance Contract (HMCC).

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

We observed several vehicles, vehicle A/C radiators, and small appliances in the scrap piles. While at the scale house, we observed a customer leave the yard with a truckload of window air conditioners. Schnitzer representatives stated that she was a regular customer with her own small refrigerant recovery and scrap business and that she had dropped off a partial load of non-appliance metal and would return with the appliances after she had recovered the refrigerant from them.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Blank HMCC
2. Blank Bill of Lading Addendum for Mercury Certification for Light Iron and Vehicle Transactions

CLOSING CONFERENCE

Compliance Assistance: We conveyed to the Schnitzer representatives that the contract option to verify refrigerant recovery was intended to be used with regular customers and executed prior to the time of transaction involving a small appliance or vehicle. We discussed the possibility of having the facility obtain its own refrigerant recovery equipment and recover refrigerant as its primary method of compliance with the safe disposal regulations.

Concerns: Schnitzer's HMCC may be being used as a verification statement (i.e., on a per-transaction basis with first-time customers), in which case it lacks the name and address of the person who recovered the refrigerant from the item and the date it was recovered.

SIGNATURES

Report Author: Natalie Pi Date: 10/23/17

Section Chief: Natalie Pi Date: 10/24/17

Facility Name: Schnitzer

Facility Location: 25 Sandquist St, Concord, NH

Date of Inspection: July 28, 2017

APPENDICES AND ATTACHMENTS

- Digital Image Log
- Blank HMCC
- Blank Bill of Lading Addendum for Mercury Certification for Light Iron and Vehicle Transactions

Facility Name: Schnitzer
Facility Location: 25 Sandquist St, Concord, NH
Date of Inspection: July 28, 2017

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Natalie Topinka & Abdi Mohamoud	2. Date(s) of Inspection: July 28, 2017
3. Company/Facility Name: Schnitzer	4. Street Address, City, State: 25 Sandquist St, Concord, NH
5. Number of Images: 22	6. Archival Record Location: CD-R labeled "Schnitzer – Sandquist St., Concord, NH Inspection Photos"

Image Number	File Name	Date and Time (incl. time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0718.JPG	7/28/2017 7:12 AM		front entrance
2	IMG_0719.JPG	7/28/2017 7:13 AM		front entrance
3	IMG_0720.JPG	7/28/2017 7:25 AM		A/C components
4	IMG_0721.JPG	7/28/2017 7:25 AM		A/C components
5	IMG_0722.JPG	7/28/2017 7:26 AM		A/C components
6	IMG_0723.JPG	7/28/2017 7:26 AM		A/C components
7	IMG_0724.JPG	7/28/2017 7:28 AM		ferrous scrap pile
8	IMG_0725.JPG	7/28/2017 7:30 AM		white goods on scrap pile
9	IMG_0726.JPG	7/28/2017 7:31 AM		old refrigerator
10	IMG_0727.JPG	7/28/2017 7:32 AM		refrigerator label - R-12
11	IMG_0728.JPG	7/28/2017 7:32 AM		white goods on scrap pile
12	IMG_0729.JPG	7/28/2017 7:33 AM		vehicles on scrap pile
13	IMG_0730.JPG	7/28/2017 7:34 AM		vehicles on scrap pile
14	P7280051.JPG	7/28/2017 7:10 AM		sign at front entrance
15	P7280052.JPG	7/28/2017 7:25 AM	43.187222, -71.521111	A/C components

Facility Name: Schnitzer

Facility Location: 25 Sandquist St, Concord, NH

Date of Inspection: July 28, 2017

16	P7280053.JPG	7/28/2017 7:25 AM	43.187465, -71.52144	A/C components
17	P7280054.JPG	7/28/2017 7:26 AM	43.187172, -71.520352	view of yard
18	P7280055.JPG	7/28/2017 7:30 AM	43.186111, -71.519444	white goods on scrap pile
19	P7280056.JPG	7/28/2017 7:31 AM	43.186111, -71.519444	old refrigerator
20	P7280057.JPG	7/28/2017 7:32 AM	43.185842, -71.519228	refrigerator label - R-12
21	P7280058.JPG	7/28/2017 7:33 AM	43.185885, -71.519378	vehicles on scrap pile
22	P7280059.JPG	7/28/2017 7:33 AM	43.18586, -71.519383	baler